

### REMARKS

**[0002]** Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

- Claims 1-10 and 18-20 are currently pending.
- Claims 11-17 and 21 were previously canceled.
- Claims 1, 6, and 18-20 are amended herein.

**[0003]** Support for the amendments to claims 1, 6, and 18 is found in the specification at least at paragraph 12.

### Cited Documents

**[0004]** The following documents have been applied to reject one or more claims of the Application:

- Firester: Firester et al, U.S. Patent No. 6,611,241
- Li: Li, et al, "Building and Using A Scalable Display Wall System", Li et al., IEEE Computer Graphics and Applications, July/August 2000, pages 29-37.
- Vaitekunas: Vaitekunas, Jeffrey J., U.S. Patent Application Publication No. 2003/0004806
- Ellis: Ellis et al, U.S. Patent No. 4,562,450
- Sakai: Sakai et al, U.S. Patent No. 5,680,525

### § 103 Rejection of Claims 1-2, 4-5, and 18-20

[0005] Claims 1-2, 4-5, and 18-20 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Firester in view of Li. Applicant respectfully traverses the rejection.

#### Independent Claim 1

[0006] Applicant submits that the cited documents do not teach or suggest every element of claim 1. Specifically, Firester does not teach or suggest, as recited in claim 1 (with emphasis added):

advertising, from a primary terminal client coupled to a plurality of small displays, the availability of a contiguous large display to a terminal server, the large contiguous display comprising the plurality of small displays that are controlled by thin clients, *the primary terminal client being a gateway device that presents itself as a single client to the terminal server while presenting itself as another server to the thin clients.*

[0007] Instead, Firester discloses an “application computer 750” that is directly connected to a plurality of “display computers 720” so that an image may be displayed by a plurality of “image generators 714”. (Firester, Figure 16). This is apparent in the following section of Firester, which states:

Each display module 712 includes an associated image processor, such as display computer 720, as illustrated in FIG. 16. Therein, an *image to be displayed*, i.e. a “source image,” *is provided from an image server, such as application computer 750, via a data bus 752, preferably a digital data bus, to the six respective image processors 720 associated with each of the six display modules DM1, DM2, . . . , DM6.* Each display computer receives and processes the image data for the portion of the image, i.e.

the sub-images, to be displayed by its associated image generators 714 and provides processed sub-image data to the respective image generators IG1, IG2, . . .

(Firester, Column 16, Lines 19-25; Figure 16).

**[0008]** Thus, even assuming, *in arguendo*, that the "image server" (application computer 750) recited in Firester is equivalent to the "terminal server" recited in claim 1, and the "image processors 720" (display computers 720) are equivalent to the "thin clients", as recited in claim 1, Firester nevertheless still does not teach or suggest every element of claim 1.

**[0009]** Specifically, Firester does not teach or suggest every element of claim 1 because Firester discloses that its "display computers 720" are *directly* connected to the "application computer 750" by a data bus, and not via a "primary terminal client", as recited in claim 1, that is *positioned between* its "application computer 750" and "display computers 720". Furthermore, since Firester does not teach a "primary terminal client", Firester also cannot teach or suggest that the "primary terminal client" is a "gateway device that presents itself as a single client to the terminal server while presenting itself as another server to the thin clients", as further recited in claim 1. (Emphasis added).

**[0010]** Additionally, since the "primary terminal client" is not taught or suggest by Firester, Firester also cannot teach or suggest the remaining elements of claim 1, as each of the remaining element refers to the "primary terminal client".

**[0011]** Moreover, the deficiencies of Firester with respect to this element are not remedied by Li. Li discloses "a multi-input mouse server program that runs on a master cursor-control computer." (Li, Page 33, Column 1, Lines 20-42). However, this

disclosure of Li does not teach or suggest the "primary terminal client," as recited in claim 1.

**[0012]** Thus, for at least the foregoing reasons, the combination of Firester and Li does not teach or suggest every element of claim 1. Accordingly, claim 1 is believed to be allowable over the cited documents.

*Dependent Claims 2 and 4-5*

**[0013]** Claims 2 and 4-5 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited documents. Therefore, claims 2 and 4-5 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

*Independent Claim 18*

**[0014]** Applicant submits that the cited documents do not teach or suggest every element of claim 18. Specifically, Firester does not teach or suggest, as recited in claim 18 (with emphasis added):

an *intermediate computer* to perform tasks that include:

advertising the availability of a contiguous large display to the network server, the large display comprising the plurality of small display devices to the network server, *the intermediate computer being a gateway device that presents itself as a single client to the network server while presenting itself as another server to the thin clients.*

**[0015]** Instead, Firester discloses an "application computer 750" that is directly connected to a plurality of "display computers 720" so that an image may be displayed

by a plurality of "image generators 714", but does not disclose an "intermediate server", as recited in claim 18. (Firester, Figure 16). This is apparent in the following section of Firester, which states (with emphasis added):

Each display module 712 includes an associated image processor, such as display computer 720, as illustrated in FIG. 16. Therein, an *image to be displayed*, i.e. a "source image," is provided from an image server, such as application computer 750, via a data bus 752, preferably a digital data bus, to the six respective image processors 720 associated with each of the six display modules DM1, DM2, . . . , DM6. Each display computer receives and processes the image data for the portion of the image, i.e. the sub-images, to be displayed by its associated image generators 714 and provides processed sub-image data to the respective image generators IG1, IG2, . . .

(Firester, Column 16, Lines 19-25; Figure 16).

**[0016]** Thus, even assuming, *in arguendo*, that the "image server" (application computer 750) recited in Firester is equivalent to the "network server" recited in claim 18, and the "image processors 720" (display computers 720) are equivalent to the "thin clients", as recited in claim 18, Firester nevertheless still does not teach or suggest every element of claim 18.

**[0017]** Specifically, Firester does not teach or suggest every element of claim 18 because Firester discloses that its "display computers 720" are *directly* connected to the "application computer 750" by a data bus, and not via a "intermediate server", as recited in claim 18, that is *positioned between* its "application computer 750" and "display computers 720". Furthermore, since Firester does not teach a "intermediate server", Firester also cannot teach or suggest that the "intermediate server" is a "gateway device

*that presents itself as a single client to the network server while presenting itself as another server to the thin clients*", as further recited in claim 18.

**[0018]** Additionally, since the "intermediate server" is not taught or suggest by Firester, Firester also cannot teach or suggest the remaining elements of claim 18, as each of the remaining element refers to the "intermediate server".

**[0019]** Moreover, the deficiencies of Firester with respect to this element are not remedied by Li. Li discloses "a multi-input mouse server program that runs on a master cursor-control computer." (Li, Page 33, Column 1, Lines 20-42). However, this disclosure of Li does not teach or suggest the "intermediate server," as recited in claim 18.

**[0020]** Thus, for at least the foregoing reasons, the combination of Firester and Li does not teach or suggest every element of claim 18. Accordingly, claim 18 is believed to be allowable over the cited documents.

#### *Dependent Claims 19-20*

**[0021]** Claims 19-20 ultimately depend from independent claim 18. As discussed above, claim 18 is allowable over the cited documents. Therefore, claims 19-20 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

#### **§ 103 Rejection of Claim 3**

**[0022]** Claim 3 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Firester in view of Li and further in view of Ellis. Applicant respectfully traverses the rejection.

[0023] Dependent claim 3 ultimately depends from claim 1. Accordingly, Applicant incorporates the reasoning presented above in response to the rejection of claim 1 under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents to Firester and Li do not teach or suggest, as recited in claim 1 (with emphasis added):

an *intermediate computer* to perform tasks that include:

advertising the availability of a contiguous large display to the network server, the large display comprising the plurality of small display devices to the network server, *the intermediate computer being a gateway device that presents itself as a single client to the network server while presenting itself as another server to the thin clients.*

[0024] Moreover, the deficiencies of Firester and Li with respect to this element of claim 1 are not remedied by Ellis. Ellis discloses that each quadrant of a plasma panel may have a different device address. (Ellis, Column 4, Lines 30-45, Column 12, Lines 30-48). However, Ellis is silent with respect to the above recited element of claim 1.

[0025] Consequently, since claim 1 is allowable over the cited documents, claim 3 is also allowable over the cited documents for at least its dependency from an allowable base claim. Claim 3 may also be allowable for the additional features that it recites.

### **§ 103 Rejection of Claims 6-7 and 9-10**

[0026] Claims 6-7 and 9-10 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Firester in view of Li and further in view of Vaitekunas. Applicant respectfully traverses the rejection.

[0027] Applicant submits that the cited documents do not teach or suggest every element of claim 6. Specifically, Applicant incorporates the reasoning presented above

in response to the rejection of claim 1 under 35 U.S.C. § 103(a) to the extent that claims 1 and 6 recite similar subject matter. Based on this incorporated reasoning, Applicant also respectfully submits the cited documents to Firester and Li do not teach or suggest the “primary terminal client”, as recited in claim 6.

**[0028]** Accordingly, since the “primary terminal client” is not taught or suggested by Firester and Li, Firester and Li also cannot teach or suggest, as recited in claim 6 (with emphasis added):

advertising, from a *primary terminal client* coupled to a plurality of small displays, the availability of a large contiguous display to a terminal server, the large contiguous display comprising the plurality of small displays that are controlled by thin clients, *the primary terminal client being a gateway device that presents itself as a single client to the terminal server while presenting itself as another server to the thin clients;*

receiving, at the *primary terminal client*, configuration information respectively from a plurality of thin clients, each of the received configuration information including attribute information associated with a separate small display that is part of the large contiguous display;

sending reconfigured remote terminal service environment from the *primary terminal client* to the small displays.

**[0029]** Moreover, the deficiencies of Firester and Li with respect to this element are not remedied by Vaitekunas. Vaitekunas discloses a billboard advertising system that is capable of dynamic content display. (Vaitekunas, Abstract). However, this disclosure of Vaitekunas does not teach or suggest the “primary terminal client,” as recited in claim 6.

**[0030]** Thus, for at least the foregoing reasons, the combination of Firester, Li and Vaitekunas does not teach or suggest every element of claim 6. Accordingly, claim 6 is believed to be allowable over the cited documents.



Dependent Claims 7 and 9-10

[0031] Claims 7 and 9-10 ultimately depend from independent claim 6. As discussed above, claim 6 is allowable over the cited documents. Therefore, claims 7 and 9-10 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

**§ 103 Rejection of Claim 8**

[0032] Claim 8 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Firester, Li and Vaitekunas and further in view of Ellis and Sakai. Applicant respectfully traverses the rejection.

[0033] Dependent claim 8 ultimately depends from claim 6. Accordingly, Applicant incorporates the reasoning presented above in response to the rejection of claim 6 under 35 U.S.C. § 103(a). Thus, Applicant respectfully submits that the cited documents to Firester, Li, and Vaitekunas do not teach or suggest every element of claim 6.

[0034] Moreover, the deficiencies of the cited documents to Firester, Li, and Vaitekunas are not remedied by Ellis. Ellis discloses that each quadrant of a plasma panel may have a different device address. (Ellis, Column 4, Lines 30-45, Column 12, Lines 30-48). Sakai is related to the generation of textures and patterns for mapping onto an object. (Sakai, Column 3, Lines 30-49). However, Ellis and Sakai are silent with respect to the elements of claim 6 that are not taught or suggested by Firester, Li, and Vaitekunas.

**[0035]** Consequently, since claim 6 is allowable over the cited documents, claim 8 is also allowable over the cited documents for at least its dependency from an allowable base claim. Claim 8 may also be allowable for the additional features that it recites.

Closing Statement

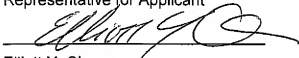
**[0036]** In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

## Conclusion

[0037] For at least the foregoing reasons, all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that would prevent allowance of this application, Applicant requests that the Examiner contact the undersigned representative before issuing a subsequent Action.

Respectfully Submitted,

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